

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Connect America Fund)	WC Docket No. 10-90
)	
Challenge Process to Competitive Coverage)	
in the Alternative Connect America Cost)	
Model (A-CAM))	
)	

**COMMENTS
OF
ENMR TELEPHONE COOPERATIVE**

ENMR Telephone Cooperative (ENMR) hereby submits the following challenge regarding certain census blocks in its study area in New Mexico (SAC 492262) being designated as “wireless-served” in v2.2 of the Alternative Connect America Cost Model (A-CAM). A review of the June 30, 2015 FCC Form 477 data identified a provider which may have led to the “served” designation. “Attachment A” of this filing is a list of the census blocks for which ENMR seeks to contest the existence of a qualifying competitor identified in Form 477 data as serving in the block. Below is a narrative on the competitor demonstrating how they fail to offer service meeting all of the requisite requirements in the blocks being challenged.

Transworld Network Corp.

Transworld Network Corp. does not offer a qualifying broadband service plan with either (a) speeds that meet the FCC’s standard of *actual* speeds of at least 10/1 Mbps, or (b) a rate that is at or below the applicable reasonably comparable benchmark rate. The first page of “Attachment B” provides a screenshot from Transworld’s website (<http://wi-power.com/media-rates.html>) showing all of their residential Internet plans in New Mexico. Transworld’s best Internet plan, the “Media 10”, provides *up to* 10 Mbps download speed. However, when a call was placed by an ENMR staff person to Transworld to inquire about the speeds that were available to addresses

in some of the contested census blocks, the customer service representative indicated that for locations further than five miles from a tower, the best service plan available was the “Xtreme”, which only offers up to 6 Mbps download speed. The second page of “Attachment B” shows a screenshot of Transworld’s Internet plans for those areas where up to 6 Mbps download speed is their best offering. Thus, it is likely that Transworld’s “Media 10” offering has limited availability in ENMR’s study area and certainly is not available ubiquitously throughout the contested census blocks.

In addition, the fine print at the bottom of the first page of “Attachment B” states that “Customers on qualifying plans may receive maximum download speeds ranging from 1.5 Mbps to 10 Mbps. Actual download speeds will vary.” (emphasis added) Clearly, 10 Mbps download is an “up to” advertised speed, not the actual speed that is provided, and the FCC has indicated that its speed standards refer to the actual speeds being provided. This means that even for those customers that are able to subscribe to Transworld’s “Media 10” offering, they will rarely obtain an actual download speed of at least 10 Mbps.

Moreover, the “Media 10” plan is priced at \$99.95, which exceeds the \$75.20 reasonable comparability benchmark for 10/1 Mbps, unlimited service by \$24.75. Thus, even if the FCC were to accept Transworld’s limited availability “Media 10” offering as a qualifying service based on speed, it is still disqualified based on its failure to be priced at or below the applicable reasonable comparability benchmark.

Finally, Transworld is incapable of porting telephone numbers in ENMR’s study area. Transworld does not have numbering resources in ENMR’s rate centers, and there is no other carrier with numbering resources and the ability to hand off local calls within ENMR’s rate centers for Transworld to partner with. Therefore, Transworld does not have the ability to port numbers in the contested census blocks.

Respectfully submitted,

/s/ Tom Phelps

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April 28, 2016

Census Block	Competitor Identified in Form 477 Data
350279602001057	TRANSWORLD NETWORK, CORP
350279602001061	TRANSWORLD NETWORK, CORP
350279602001069	TRANSWORLD NETWORK, CORP
350279602001072	TRANSWORLD NETWORK, CORP
350279602001074	TRANSWORLD NETWORK, CORP
350279602001078	TRANSWORLD NETWORK, CORP
350279602001079	TRANSWORLD NETWORK, CORP
350279602001080	TRANSWORLD NETWORK, CORP
350279602001082	TRANSWORLD NETWORK, CORP
350279602001083	TRANSWORLD NETWORK, CORP
350279602001085	TRANSWORLD NETWORK, CORP
350279602001087	TRANSWORLD NETWORK, CORP
350279602001088	TRANSWORLD NETWORK, CORP
350279602001095	TRANSWORLD NETWORK, CORP
350279602001097	TRANSWORLD NETWORK, CORP
350279602001099	TRANSWORLD NETWORK, CORP
350279602001109	TRANSWORLD NETWORK, CORP
350279602001111	TRANSWORLD NETWORK, CORP
350279602001112	TRANSWORLD NETWORK, CORP
350279602001113	TRANSWORLD NETWORK, CORP
350279602001114	TRANSWORLD NETWORK, CORP
350279602001115	TRANSWORLD NETWORK, CORP
350279602001117	TRANSWORLD NETWORK, CORP
350279602001119	TRANSWORLD NETWORK, CORP
350279602001121	TRANSWORLD NETWORK, CORP
350279602001123	TRANSWORLD NETWORK, CORP
350279602001125	TRANSWORLD NETWORK, CORP
350279602001126	TRANSWORLD NETWORK, CORP
350279602001136	TRANSWORLD NETWORK, CORP
350279602001140	TRANSWORLD NETWORK, CORP
350279602001182	TRANSWORLD NETWORK, CORP
350279602001386	TRANSWORLD NETWORK, CORP
350279602001393	TRANSWORLD NETWORK, CORP
350279602001397	TRANSWORLD NETWORK, CORP
350279602001398	TRANSWORLD NETWORK, CORP
350279602001407	TRANSWORLD NETWORK, CORP
350279602001430	TRANSWORLD NETWORK, CORP
350279602001435	TRANSWORLD NETWORK, CORP
350279602001436	TRANSWORLD NETWORK, CORP
350279602001450	TRANSWORLD NETWORK, CORP


Census Block	Competitor Identified in Form 477 Data
350279602001466	TRANSWORLD NETWORK, CORP
350279602001467	TRANSWORLD NETWORK, CORP
350279602001469	TRANSWORLD NETWORK, CORP
350279602001478	TRANSWORLD NETWORK, CORP
350279602001485	TRANSWORLD NETWORK, CORP
350279602001487	TRANSWORLD NETWORK, CORP
350279602001493	TRANSWORLD NETWORK, CORP
350279602001507	TRANSWORLD NETWORK, CORP
350279602001512	TRANSWORLD NETWORK, CORP
350279602001602	TRANSWORLD NETWORK, CORP
350279602001959	TRANSWORLD NETWORK, CORP
350279602001960	TRANSWORLD NETWORK, CORP
350279602001961	TRANSWORLD NETWORK, CORP
350279602001962	TRANSWORLD NETWORK, CORP
350279602001963	TRANSWORLD NETWORK, CORP
350279602001964	TRANSWORLD NETWORK, CORP
350279602001965	TRANSWORLD NETWORK, CORP
350279602001966	TRANSWORLD NETWORK, CORP
350279602001969	TRANSWORLD NETWORK, CORP
350279602001970	TRANSWORLD NETWORK, CORP
350279602001971	TRANSWORLD NETWORK, CORP
350279602001972	TRANSWORLD NETWORK, CORP
350279602001973	TRANSWORLD NETWORK, CORP
350279602001975	TRANSWORLD NETWORK, CORP
350279602001984	TRANSWORLD NETWORK, CORP
350490103101011	TRANSWORLD NETWORK, CORP
350490103101171	TRANSWORLD NETWORK, CORP
350490103101184	TRANSWORLD NETWORK, CORP
350539781001004	TRANSWORLD NETWORK, CORP
350539781001005	TRANSWORLD NETWORK, CORP
350539781001012	TRANSWORLD NETWORK, CORP
350539781001013	TRANSWORLD NETWORK, CORP
350539781001018	TRANSWORLD NETWORK, CORP
350539781001056	TRANSWORLD NETWORK, CORP
350539781001083	TRANSWORLD NETWORK, CORP
350539781001227	TRANSWORLD NETWORK, CORP
350539781001240	TRANSWORLD NETWORK, CORP
350539781001283	TRANSWORLD NETWORK, CORP
350539781001308	TRANSWORLD NETWORK, CORP
350539781001314	TRANSWORLD NETWORK, CORP

Census Block	Competitor Identified in Form 477 Data
350539781001316	TRANSWORLD NETWORK, CORP
350539781001320	TRANSWORLD NETWORK, CORP
350539781001322	TRANSWORLD NETWORK, CORP
350539781001358	TRANSWORLD NETWORK, CORP
350539781001361	TRANSWORLD NETWORK, CORP
350539781001366	TRANSWORLD NETWORK, CORP
350539781001389	TRANSWORLD NETWORK, CORP
350539781001391	TRANSWORLD NETWORK, CORP
350539781001409	TRANSWORLD NETWORK, CORP
350539781001836	TRANSWORLD NETWORK, CORP
350539781002003	TRANSWORLD NETWORK, CORP
350579632022005	TRANSWORLD NETWORK, CORP
350579632022021	TRANSWORLD NETWORK, CORP
350579632022281	TRANSWORLD NETWORK, CORP
350579636001001	TRANSWORLD NETWORK, CORP
350579636002009	TRANSWORLD NETWORK, CORP
350579636002012	TRANSWORLD NETWORK, CORP
350579636002069	TRANSWORLD NETWORK, CORP
350579636002081	TRANSWORLD NETWORK, CORP
350579636002084	TRANSWORLD NETWORK, CORP
350579636002090	TRANSWORLD NETWORK, CORP
350579636003000	TRANSWORLD NETWORK, CORP
350579637001188	TRANSWORLD NETWORK, CORP
350579637001212	TRANSWORLD NETWORK, CORP
350579637001257	TRANSWORLD NETWORK, CORP
350579637001262	TRANSWORLD NETWORK, CORP
350579637001282	TRANSWORLD NETWORK, CORP
350579637001285	TRANSWORLD NETWORK, CORP
350579637001289	TRANSWORLD NETWORK, CORP
350579637001291	TRANSWORLD NETWORK, CORP
350579637001292	TRANSWORLD NETWORK, CORP
350579637001295	TRANSWORLD NETWORK, CORP
350579637001299	TRANSWORLD NETWORK, CORP
350579637001320	TRANSWORLD NETWORK, CORP
350579637001322	TRANSWORLD NETWORK, CORP
350579637001456	TRANSWORLD NETWORK, CORP
350579637001483	TRANSWORLD NETWORK, CORP
350579637001484	TRANSWORLD NETWORK, CORP
350579637001485	TRANSWORLD NETWORK, CORP
350579637001486	TRANSWORLD NETWORK, CORP

Census Block	Competitor Identified in Form 477 Data
350579637001487	TRANSWORLD NETWORK, CORP
350579637001488	TRANSWORLD NETWORK, CORP
350579637001493	TRANSWORLD NETWORK, CORP
350579637001517	TRANSWORLD NETWORK, CORP
350579637001528	TRANSWORLD NETWORK, CORP
350579637001530	TRANSWORLD NETWORK, CORP
350579637001532	TRANSWORLD NETWORK, CORP
350579637001533	TRANSWORLD NETWORK, CORP
350579637001536	TRANSWORLD NETWORK, CORP
350579637001544	TRANSWORLD NETWORK, CORP
350579637001657	TRANSWORLD NETWORK, CORP
350579637001664	TRANSWORLD NETWORK, CORP
350579637001668	TRANSWORLD NETWORK, CORP
350579637001680	TRANSWORLD NETWORK, CORP
350579637001686	TRANSWORLD NETWORK, CORP
350579637001694	TRANSWORLD NETWORK, CORP
350579637001695	TRANSWORLD NETWORK, CORP
350579637001699	TRANSWORLD NETWORK, CORP
350579637001707	TRANSWORLD NETWORK, CORP
350579637001708	TRANSWORLD NETWORK, CORP
350579637001709	TRANSWORLD NETWORK, CORP
350579637001710	TRANSWORLD NETWORK, CORP
350579637001711	TRANSWORLD NETWORK, CORP
350579637001716	TRANSWORLD NETWORK, CORP
350579637001720	TRANSWORLD NETWORK, CORP
350579637001724	TRANSWORLD NETWORK, CORP
350579637001728	TRANSWORLD NETWORK, CORP
350579637001729	TRANSWORLD NETWORK, CORP
350579637001730	TRANSWORLD NETWORK, CORP
350579637001731	TRANSWORLD NETWORK, CORP
350579637001770	TRANSWORLD NETWORK, CORP
350579637001773	TRANSWORLD NETWORK, CORP
350579637001781	TRANSWORLD NETWORK, CORP
350579637001811	TRANSWORLD NETWORK, CORP
350579637001817	TRANSWORLD NETWORK, CORP
350579637001821	TRANSWORLD NETWORK, CORP
350579637001833	TRANSWORLD NETWORK, CORP
350579637001839	TRANSWORLD NETWORK, CORP
350579637001861	TRANSWORLD NETWORK, CORP
350579637001864	TRANSWORLD NETWORK, CORP

Census Block	Competitor Identified in Form 477 Data
350579637001867	TRANSWORLD NETWORK, CORP
350579637001868	TRANSWORLD NETWORK, CORP
350579637001870	TRANSWORLD NETWORK, CORP
350579637001873	TRANSWORLD NETWORK, CORP
350579637001875	TRANSWORLD NETWORK, CORP
350579637001877	TRANSWORLD NETWORK, CORP
350579637001878	TRANSWORLD NETWORK, CORP
350579637001879	TRANSWORLD NETWORK, CORP
350579637001880	TRANSWORLD NETWORK, CORP
350579637001881	TRANSWORLD NETWORK, CORP
350579637001888	TRANSWORLD NETWORK, CORP
350579637001891	TRANSWORLD NETWORK, CORP
350579637001893	TRANSWORLD NETWORK, CORP
350579637001894	TRANSWORLD NETWORK, CORP
350579637001904	TRANSWORLD NETWORK, CORP
350579637001905	TRANSWORLD NETWORK, CORP
350579637001918	TRANSWORLD NETWORK, CORP
350579637001919	TRANSWORLD NETWORK, CORP
350579637001921	TRANSWORLD NETWORK, CORP
350579637001922	TRANSWORLD NETWORK, CORP
350579637001936	TRANSWORLD NETWORK, CORP

Attachment B

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Pricing Plans

Internet Plans			
Plans	Speeds	Pricing	Best Plan if You:
Power	up to 2 Mbps	\$43.95*	Send & receive email, surf the net & download medium size files
Turbo	up to 4 Mbps	\$59.95*	Download videos, photos and music
Mega	up to 6 Mbps	\$75.95*	Email larger files, download videos, photos and music
Xtreme	up to 6 Mbps	\$86.95*	Upload larger files and play online games
Media 8	up to 8 Mbps	\$92.95*	Stream your favorite TV shows and movies.
Media 10	up to 10 Mbps	\$99.95	Stream video on multiple devices with greater bandwidth.

Residential Phone Plans	
Plans	Monthly Fee
Wi-Power Digital Phone Plan (with Wi-Power Internet Bundle Discount)	\$25.05 ²
Wi-Power Digital Phone Plan (with Affinity Discount)	\$30.05*

* Services provided by TransWorld Network, Corp. Service not available in all areas and not all plans available in all areas. With approved credit. Restrictions, terms, and conditions apply. Taxes, regulatory, installation/activation, surcharges and other charges not included. Call for details or visit us at www.wi-power.com or www.twncorp.com for additional information and for terms and conditions of services. 1. Includes monthly maintenance fee. Customers on qualifying plans may receive maximum download speeds ranging from 1.5 Mbps to 10.0 Mbps. Actual download speeds will vary. 2. Not available with satellite Internet. Minimum 512 Kbps Internet connection speed required. International call rates apply. Unlimited calling applies to local and long distance calls within the contiguous United States. Digital Phone 911 Service operates differently than traditional 911. See <http://www.wi-power.com/911.html> for information. Unlimited usage subject to "fair and normal" usage limitations as described in terms and conditions. 3. † Wi-Power Xtreme and Wi-Power Media Plans deliver higher upload speeds. Please call for more details.

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Attachment B

**About Wi-Power****What is it?**

Wi-Power is secure, high-speed wireless access and the next generation of Internet connectivity. Wi-Power provides true high-speed broadband Internet access. You do **NOT** have to be a Trico customer to sign up for Wi-Power!

Cost Effective

Wi-Power is an affordable broadband solution, offering the latest technology at competitive prices.

Faster Speeds

Download speeds up to 5 Mbps, so it's easy to choose the plan that's right for you.

Increased Security

Wi-Power safeguards sensitive and proprietary information by securing data with industry standard encryption. In fact, every customer is provided with a dedicated wireless connection.

Reliability

Wi-Power's proven technology is always on, always available, and does not require a traditional wireline connection.

How does it work?

Wi-Power connects to the Internet with download speeds starting at 384 Kbps, using state of the art synchronized transmissions. Wi-Power technology addresses even the unique challenges of rural communities. Customers enjoy the security of a dedicated high-speed wireless connection without the use of cable, phone lines or satellite.

Superior Customer Care

Wi-Power offers timely troubleshooting and support services 24 hours a day, 7 days a week. Local technicians and sales support personnel are available to assist with your Internet needs.

Internet Plus Plans			
Plans	Speeds	Pricing	Best Plan if You:
Value	512Kbps	\$39.95*	Surf the net and email family and friends
Power	up to 2 Mbps	\$43.95*	Send & receive email, surf the net & download medium size files
Turbo	up to 4 Mbps	\$59.95*	Download videos, photos and music
Mega	up to 6 Mbps	\$75.95*	Email larger files, download videos, photos and music
Xtreme[†]	up to 6 Mbps	\$86.95*	Upload larger files and play online games

[†] Wi-Power Xtreme Plan delivers higher upload speeds.
Please call for more details.



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